TITLE INDEX TO ARTICLES

PAGE

DISCOUNT BONDS—ORDINARY INCOME OR CAPITAL GAIN?: *Gene M. Zafft*..... 51

EROSION OF THE TAX BASE AND RATE STRUCTURE: *Randolph E. Paul*..... 203

MOTION PICTURE CO-PRODUCTION DEALS AND THEATRICAL BUSINESS ORGANIZATION (FIRST INSTALLMENT): *Joseph Taubman*..... 113

MOTION PICTURE CO-PRODUCTION DEALS AND THEATRICAL BUSINESS ORGANIZATION (SECOND INSTALLMENT): *Joseph Taubman*..... 303

PARTNERSHIP FORMATION AND SALE OR TRANSFER UNDER THE 1954 CODE: *Charles B. E. Freeman*..... 1

RANDOLPH E. PAUL: *Harry J. Rudick*..... 201

SALES, CHURCHES, AND MONKEYSHINES: *James A. Moore and David H. W. Dohan*.. 87

SECTION 346(a)(2): THE CONTRACTION THEORY: *John C. Chommie*..... 407

SOME RECENT DEVELOPMENTS IN THE CONCEPT OF TAXABLE INCOME: *Leslie M. Rapp*..... 329

SUBDIVISIONS OF REAL ESTATE—"DEALER" V. "INVESTOR" PROBLEM: *Stanley Weithorn*..... 157

TAX CRIMES—STATUTE OF LIMITATIONS—TOLLING PROVISOS: *Jim R. Carrigan*..... 137

THE AMBIGUOUS TAX NATURE OF THE VARIOUS COSTS OF BORROWING CAPITAL: *Robert T. A. Molloy*..... 373

THE CURRENT TREND IN GUARANTY CASES: AN IMPETUS TO THIN-INCORPORATION?: *Donald J. Holzman*..... 29

THE RISE AND DECLINE OF THE ESTATE TAX: *Louis Eisenstein*..... 223

THE SCOPE OF THE TAXABLE SALE UNDER SALES AND USE TAX ACTS: SALES AS DISTINGUISHED FROM SERVICES: *Jerome R. Hellerstein*..... 261

TITLE INDEX TO MISCELLANEOUS ITEMS

PAGE

ADDENDA 177

NOTES

AN OLD FORMULA IN NEW ATTIRE: *Adolph E. Grunewald* 190

ANOTHER COMMUNITY PROPERTY ANOMALY: *Robert Emmet Clark* 76

TAX TREATMENT OF THE LEASE WITH OPTION TO PURCHASE: IS ALLOCATION THE ANSWER?: *Scott Lukins* 65

THE NON-RESTRICTED EMPLOYEE STOCK OPTION—AN EXECUTIVE'S DELIGHT: *William I. Sabin* 179

THE TAXATION OF PARTNERSHIP PROFITS UNDER THE INCOME TAX ACT OF PUERTO RICO OF 1954: *José A. Mayoral* 315

WHO CAN DEDUCT A BUSINESS EXPENSE?: *Arthur J. Lempert* 433

BOOK REVIEWS

CASEY: FEDERAL TAX PRACTICE: *Charles S. Lyon* 447

WARREN AND SURREY: FEDERAL ESTATE AND GIFT TAXATION, CASES AND MATERIALS: *Joseph Trachtman* 445

SELECTED TAX READING (Compiled by Sydney Prerau and Irving Schreiber) 85, 199, 327, 459

AUTHOR INDEX

PAGE

CARRIGAN, JIM R.: *Tax Crimes—Statute of Limitations—Tolling Provisos*..... 137

CHOMMIE, JOHN C.: *Section 346(a)(2): The Contraction Theory*..... 407

CLARK, ROBERT EMMET: *Another Community Property Anomaly*..... 76

DOHAN, DAVID H. W. AND JAMES A. MOORE: *Sales, Churches, and Monkeyshines*.. 87

EISENSTEIN, LOUIS: *The Rise and Decline of the Estate Tax*..... 223

FREEMAN, CHARLES B. E.: *Partnership Formation and Sale or Transfer under the 1954 Code* 1

GRUNEWALD, ADOLPH E.: *An Old Formula in New Attire*..... 190

HELLERSTEIN, JEROME R.: *The Scope of the Taxable Sale under Sales and Use Tax Acts: Sales as Distinguished from Services*..... 261

HOLZMAN, DONALD J.: *The Current Trend in Guaranty Cases: An Impetus to Thin-Incorporation?* 29

LEMPERT, ARTHUR J.: *Who Can Deduct a Business Expense?*..... 433

LUKINS, SCOTT: *Tax Treatment of the Lease With Option to Purchase: Is Allocation the Answer?*..... 65

LYON, CHARLES S.: *Review of Casey: Federal Tax Practice*..... 447

MAYORAL, JOSÉ A.: *The Taxation of Partnership Profits under the Income Tax Act of Puerto Rico of 1954*..... 315

MOLLOY, ROBERT T. A.: *The Ambiguous Tax Nature of the Various Costs of Borrowing Capital* 373

MOORE, JAMES A. AND DAVID H. W. DOHAN: *Sales, Churches, and Monkeyshines*.... 87

PAUL, RANDOLPH E.: *Erosion of the Tax Base and Rate Structure*..... 203

PRERAU, SYDNEY AND IRVING SCHREIBER: *Selected Tax Reading*.....85, 199, 327, 459

RAPP, LESLIE M.: *Some Recent Developments in the Concept of Taxable Income*.. 329

RUDICK, HARRY J.: *Randolph E. Paul*..... 201

SABIN, WILLIAM I.: *The Non-Restricted Employee Stock Option—An Executive's Delight* 179

SCHREIBER, IRVING AND SYDNEY PRERAU: *Selected Tax Reading*.....85, 199, 327, 459

TAUBMAN, JOSEPH: *Motion Picture Co-Production Deals and Theatrical Business Organization (First Installment)*..... 113

TAUBMAN, JOSEPH: *Motion Picture Co-Production Deals and Theatrical Business Organization (Second Installment)*..... 303

TRACHTMAN, JOSEPH: *Review of Warren and Surrey: Federal Estate and Gift Taxation, Cases and Materials*..... 445

WEITHORN, STANLEY: *Subdivisions of Real Estate—"Dealer" v. "Investor" Problem* 157

ZAFFT, GENE M.: *Discount Bonds—Ordinary Income or Capital Gain?*..... 51